

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

AMANDA VELEZ,

Defendant.

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Criminal Action No. 06- 45 - JNA

REDACTED

**INDICTMENT**

The Grand Jury for the District of Delaware charges that:

**COUNT I**

On or about April 26, 2005, in the State and District of Delaware, AMANDA VELEZ, defendant herein, in connection with her attempted acquisition of an F.B. Radom, model 35, 9mm pistol, serial number D4333, from Miller's Gun Center, Inc., a licensed dealer, knowingly made a false and fictitious written statement to Miller's Gun Center, Inc., which statement was likely to deceive Miller's Gun Center, Inc., as to a fact material to the lawfulness of such attempted acquisition of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented that she had not been convicted of a misdemeanor crime of domestic violence, when in fact, as the defendant then well knew, she had been convicted of a misdemeanor crime of domestic violence, to wit, a conviction on or about August 19, 2004 for a

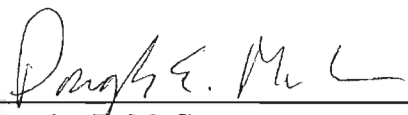


violation of 11 Del. C. § 611, all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

A TRUE BILL:

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Foreperson

COLM F. CONNOLLY  
United States Attorney

BY:   
Douglas E. McCann  
Assistant United States Attorney

Dated: May 2, 2006